

Message

From: Robert Law [rlaw@demaximis.com]
Sent: 10/19/2018 8:07:45 PM
To: Salkie, Diane [Salkie.Diane@epa.gov]; Sivak, Michael [Sivak.Michael@epa.gov]
CC: Potter Willard [otto@demaximis.com]
Subject: RE: FS Schedule Assumption Questions

Thanks

Robert Law, Ph.D.
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>>> "Salkie, Diane" <Salkie.Diane@epa.gov> 10/19/2018 3:45 PM >>>
See red answers below

From: Robert Law [mailto:rlaw@demaximis.com]
Sent: Friday, October 19, 2018 10:07 AM
To: Salkie, Diane <Salkie.Diane@epa.gov>; Sivak, Michael <Sivak.Michael@epa.gov>
Cc: Potter Willard <otto@demaximis.com>
Subject: FS Schedule Assumption Questions

1. Should we assume that Region 2 will schedule the NRRB and CSTAG Review after the Final FS is delivered but before it is approved? ? We don't necessarily need to wait until the FS is "final" to meet with NRRB/CSTAG. If we have a good draft and we are in agreement with the alternatives, we could potentially have our NRRB/CSTAG meeting. For purposes of your scheduling, you should plan for the CSTAG/NRRB meeting after a draft final/final is submitted but before the FS is approved.

2. Would you issue the Proposed Plan shortly (less than a month) after the approval of Final FS? That's a tough one. We'd need to wait until after the NRRB/CSTAG meeting, receive the comments, reply to the comments, and brief the EPA Administrator (remember, the remedy will be over \$50M, so there will need to be a series of briefings along the way). Approximately, 2 - 3 months after the NRRB/CSTAG meeting.

3. Should we assume 30 days for Proposed Plan comment period? You should assume 60 days.

4. Should we include in the FS schedule time for the peer review of the Bioaccumulation model? The peer review should proceed in parallel with other efforts once the calibration of the current model is approved, and none of the FS, proposed plan, or ROD schedule should be dependent on the peer review.

5. How will you handle the comment/response of the draft FS and Final FS - will it be with formal comment and response documents ("tossing back and forth over the fence") or are we going to do it real time in our weekly meetings? For instance, would we review, discuss and resolve general and specific comments in face to face meetings while dealing/addressing the list of grammar and formatting off-line? That's a great question. Perhaps we can discuss this at Thursday's kick-off meeting. I'd like to be able to review it on a weekly basis, with a very short review once the draft is submitted. I think NJDEP may require a formal review at the end, as well.

6. Is a reasonable goal for the IA ROD no later than September 2020? December 2020 at the earliest is more reasonable.

Thanks

R/
Rob

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